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Attorney for Lila Masters

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BUTTE DIVISION

| | | |
|--------------------------------|---|---------------------------|
| BALANCE POINT DIVORCE |) | CAUSE NO. CV-12-40-BU-SEH |
| FUNDING, LLC, a Nevada |) | |
| Limited Liability Company, and |) | |
| BALANCE POINT FUNDING |) | |
| NUMBER 1, LLC, |) | |
| |) | |
| Plaintiffs/Counter-Defendants |) | MOTION FOR SUMMARY |
| v. |) | JUDGMENT TO DECLARE |
| |) | BALANCE POINT'S |
| |) | CONTRACTS VOID AS A |
| LILA MASTERS, Counterclaimant, |) | MATTER OF LAW |
| Third-Party Plaintiff and |) | |
| Defendant, and JOHN DOES 1-5, |) | |
| and JANE DOES, 1-5, |) | |
| Defendants. |) | |
| |) | |
| |) | |
| v. |) | |
| |) | |
| STACEY NAPP, and John Does |) | |
| 1-5. |) | |
| |) | |
| Third-Party Defendants. |) | |
| |) | |

COMES NOW Lila Masters, Defendant/Counterclaimant/Third-Party Plaintiff, and moves this Court to enter an Order declaring Balance Point's Funding Agreements void as a matter of law. Pursuant to Local Rule 7.1 (c)(1), counsel for Plaintiffs Balance Point Divorce Funding, LLC and Balance Point Funding Number 1, LLC have been contacted and oppose this motion. A brief in support of the motion has been filed.

WHEREFORE, it is respectfully requested that the Court grant Lila Masters motion for Summary Judgment.

Respectfully submitted this 28th day of June, 2013.

/s/ Todd Shea
Todd Shea
Attorney for Lila Masters

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of June, 2013, a copy of the foregoing document was served upon the following by:

Charles E. Hansberry
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☐ U.S. Mail
☐ Fax
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/s/ Todd Shea
Todd Shea
Attorney for Lila Masters